

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

ROLANDO ROJAS and EVA BATEN BATEN, *on  
behalf of themselves, FLSA Collective Plaintiffs and  
the Class,*

Plaintiffs,

v.

ALPHA WASTE SOLUTIONS, LLC,  
and GEORGI MARTE,

Defendants.

---

Case No.: 1:22-cv-07938

**NOTICE OF ACCEPTANCE OF  
OFFER OF JUDGMENT**

Pursuant to Rule 68 of the Federal Rules of civil Procedure, Plaintiffs ROLANDO ROJAS and EVA BATEN BATEN hereby accept and provide notice that they have accepted Defendant's Offer of Judgment dated August 31, 2023, and annexed hereto as **Exhibit A**.

Dated: New York, New York  
August 31, 2023

Respectfully submitted,

LEE LITIGATION GROUP, PLLC  
C.K. Lee, Esq.  
148 West 24th Street, Eighth Floor  
New York, NY 10011  
Tel: 212-661-0052  
Fax: 212-465-1181  
*Attorney for Plaintiffs, FLSA Collective  
Plaintiffs and the Class*

By: \_\_\_\_\_

C.K. Lee, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2023, I caused Plaintiffs' Notice of Acceptance of Offer of Judgment to be served, via electronic mail, upon Defendant's counsel of record in this matter:

Michael Sepe, Esq.  
41 Front Street, Second Floor  
Rockville Centre, NY 11570  
(516) 766-0477  
[ms@sepelaw.com](mailto:ms@sepelaw.com)  
*Attorneys for Defendants*

By: 

C.K. Lee, Esq.